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June 10, 2004

VIA HAND DELIVERY

Ms. Deborah Taylor Tate, Chairman
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243

***Re: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireline to Wireless Number
Portability Obligations Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended
Docket No. 03-00633***

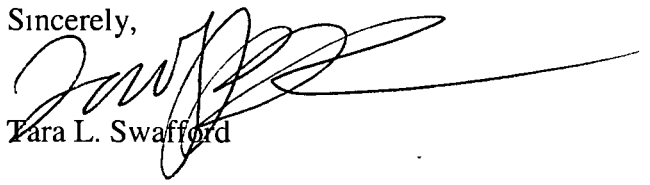
Dear Chairman Tate:

Enclosed for filing in the above-referenced docket are the original and thirteen copies of The Coalition's First Set of Discovery Requests to SprintCom, Inc. d/b/a Sprint PCS in the above-referenced matter

Should you have any questions with respect to this filing, please do not hesitate to contact me at the number shown above.

Thanking you in advance for your assistance with this matter, I am

Sincerely,


Tara L. Swafford

TLS:bb

Enclosures

cc Timothy C. Phillips, Esq.
Edward Phillips, Esq.
Melvin J. Malone, Esq.

**Before the
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

| | | |
|--|---|---------------------|
| In the Matter of |) | |
| |) | |
| Tennessee Coalition of Rural |) | Docket No. 03-00633 |
| Incumbent Telephone Companies |) | |
| And Cooperatives |) | |
| Request for Suspension of Wireline to |) | |
| To Wireless Number Portability Obligations |) | |
| Pursuant to Section 251(f)(2) of the |) | |
| Communications Act of 1934, as Amended |) | |

**THE COALITION'S FIRST SET OF DISCOVERY REQUESTS TO SPRINTCOM, INC.
D/B/A SPRINT PCS**

Pursuant to the TRA's Order of June 2, 2004 in this matter, the Tennessee Coalition of Rural Incumbent Telephone Companies And Cooperatives (the "Coalition") requests that Intervenor SprintCom, Inc. d/b/a Sprint PCS ("Sprint") respond to these discovery requests at the offices of Bass, Berry & Sims, PLC, 315 Deaderick Street, Suite 2700, Nashville, Tennessee 37238-3001, no later than June 14, 2004.

DEFINITIONS

In these discovery requests, the terms "document" or "documents" or "documentation" refers to all written, reported, recorded or graphic matter (including all drafts, originals and nonconforming copies that contain deletions, insertions, handwritten notes or comments, and the like) however produced or reproduced to any tangible or intangible, permanent or temporary record and, without limitation, shall include the following: all letters, correspondence, records of conferences or meetings, memoranda, notes, printed electronic mail ("e-mail"), telegrams, telephone logs, teletypes, telexes, banking records, notices of wire transfer of funds, canceled checks, books of account, budgets, financial records, contracts, agreements, invoices, speeches,

transcripts, depositions, press releases, affidavits, communications with government bodies, interoffice communications, working papers, newspaper or magazine articles, computer data, tax returns, vouchers, papers similar to any of the foregoing, and any other writings of every kind and description (whether or not actually used) and any other records from which information can be obtained and translated into reasonably usable form, including without limitation, e-mail, voice recordings, video and audio recordings, photographs, films, tapes and other data compilations.

DISCOVERY REQUESTS

1. Please list since January 1, 1997 to the present the number of requests Sprint has received for numbers to be ported to Sprint from a wireline number of a customer served by any member of the Coalition. For *each* request, please list the company and exchange for the number that has requested porting, the telephone number associated with that request, and the date of the porting request.

RESPONSE:

2. Please provide a copy of each request from Sprint to a Coalition member for local number portability. Please state whether you consider any of these requests to be “bona fide” and please provide all factual and legal reasons supporting your position.

RESPONSE:

3. Please state whether Sprint can comply with porting requests and provide service for customers within all areas serviced by the Coalition. If there are any areas where Sprint cannot accept porting requests and provide service within this area, please specify the exchange and the Coalition member that serves that location.

RESPONSE:

4. Is Sprint willing to be responsible for the costs to transport calls to a ported number where Sprint has no physical point of interconnection on the Coalition's network?

RESPONSE:

5. Please state your position on how calls to a ported number should be routed by the Coalition member.

RESPONSE:

6. Please confirm that Sprint does not dispute the costs set forth by each Coalition member in the Amended Petition on pages 10-14. If Sprint's response is anything but an unqualified confirmation, please provide the legal and factual basis for the response.

RESPONSE:

7. Please confirm that Sprint does not dispute the dates of in-office LNP technical, hardware, or software deployment, as provided in Attachment A to the Coalitions' Amended Petition. If Sprint's response is anything but an unqualified confirmation, please provide the legal and factual basis for the response.

RESPONSE:

8. Identify each person whom you expect to call as an expert witness at any hearing in this docket, and for each such expert witness:

- (a) identify the field in which the witness is to be offered as an expert;
- (b) provide complete background information, including the expert's current employer as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the witness;
- (c) provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (d) identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

- (e) identify for each such expert any person whom the expert consulted or otherwise communicated with in connection with his expected testimony;
- (f) identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;
- (g) identify all documents or things shown to, delivered to, received from, relied upon, or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that expert for review in connection with testimony and opinions; and
- (h) identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert.

RESPONSE:

9. Please produce copies of any and all documents referred to or relied upon in responding to the Coalition's discovery requests.

RESPONSE:

10. Please provide all material provided to, reviewed by or produced by any expert or consultant retained by Sprint to testify or to provide information from which another expert will testify concerning this case.

RESPONSE:

11. Please produce all work papers of any of Sprint's proposed experts, including but not limited to file notes, chart notes, tests, test results, interview and/or consult notes and all other file documentation that any of Sprint's expert witnesses in any way used, created, generated or consulted by any of Sprint's expert witnesses in connection with the evaluation, conclusions and opinion in the captioned matter.

RESPONSE:

12. Please produce a copy of all trade articles, journals, treatises and publications of any kind in any way utilized or relied upon by any of Sprint's proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter.

RESPONSE:

13. Please produce a copy of all documents which relate or pertain to any factual information provided to, gathered by, utilized or relied upon by any of Sprint's proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter.

RESPONSE:

14. Please produce a copy of all articles, journals, books or speeches written by or co-written by any of Sprint's expert witnesses, whether published or not.

RESPONSE:

15. Please produce any and all documentation, items, reports, data, communications, and evidence of any kind that Sprint intends to offer as evidence at the hearing or to refer to in any way at the hearing.

RESPONSE:

16. Please produce all documents that refer or relate to the subject matter of your responses to Request Nos. 1 - 7.

RESPONSE:

17. Please identify by name, address, employer, and current telephone number, all persons having knowledge of the subject matter of your responses to Request Nos. 1-7.

RESPONSE:

18. Please list all witnesses you expect will provide testimony at the hearing of this matter, including their name, address, and a summary of the scope of their testimony.

RESPONSE:

Respectfully submitted,
The Tennessee Coalition of
Incumbent Rural Telephone
Companies and Cooperatives

By: 

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Of Counsel:
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202-296-8890

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via hand delivery or facsimile on June 16th, 2004, upon:

Richard Collier, Esq.
General Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Hand delivery ☒
U. S. Mail ☐
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